

Our File No.: 49269
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UNITED STATES
BANKRUPTCY COURT FOR
THE DISTRICT OF NEW
JERSEY

IN RE:
JOHN P. CONKLIN
MELISSA A. CONKLIN

CHAPTER 13
CASE NO: 17-36011(KCF)
HEARING DATE: 8-6-2019

NOTICE OF MOTION OF
FORD MOTOR CREDIT
COMPANY LLC TO MODIFY
THE AUTOMATIC STAY

To:

John and Melissa Conklin
63 Guilford Place
Burlington, NJ 08016
Debtor

Brad J. Sadek, Esq.
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
Attorney for the debtor

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853
Trustee

U.S. Trustee, US Dept of Justice
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

John R. Morton, Jr., Esquire, attorney for Ford Motor Credit Company LLC, has filed papers with the Court for relief from the automatic stay to permit Ford Motor Credit Company LLC to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court
402 E. State Street
Trenton, NJ 08608

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire
110 Marter Avenue, Suite 301
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

Attend the hearing scheduled to be held on August 6, 2019 at 9 a.m. in Courtroom #8, United States Bankruptcy Court, 402 E. State Street, Trenton, New Jersey 08608.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 7-10-2019

/s/ John R. Morton, Jr.

John R. Morton, Jr., Esquire
Attorney for Ford Motor Credit
Company LLC